

ZMO Law PLLC

September 4, 2024

Via ECF and email

Hon. Alvin K. Hellerstein
Southern District of New York
United States District Court
500 Pearl Street
New York, NY 10007

RE: *U.S. v. Hugo Armando Carvajal Barrios*, 11 Cr. 205 (AKH)

Dear Judge Hellerstein:

This office represents Gen. Hugo Carvajal in the above-captioned matter. I write to advise the Court regarding the status of our representation of Gen. Carvajal and to highlight a potential scheduling conflict that has arisen.

First, I understand from Gen. Carvajal that he has engaged Robert Feitel, Esq. and Sandi Rhee, Esq. to represent him in this matter going forward and that he prefers that Tess Cohen, Esq. and I withdraw from our representation of him. Mr. Feitel entered his notice of appearance today.

Mr. Feitel advises that he plans to obtain Gen. Carvajal's signature this week on a Stipulation of Substitution of Counsel pursuant to Local Criminal Rule 1.2 and Local Civil Rule 1.4. Once we receive that signed stipulation, Ms. Cohen and I intend to move to withdraw as counsel.

Second, neither Ms. Cohen nor I are available to attend the status conference scheduled by the Court for September 24, 2024. We both have longstanding travel plans out of state and out of the country. If our personal appearance is required for any purpose, we ask that it be scheduled for on or after October 4, 2024, by which time we both will have returned.

The conf. of Sep. 24, 2024 is adjourned, and time is extended, to Oct. 22, 2024, noon.
9-5-24
John Hellerstein

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Thank you for your attention to this case.

Very truly yours,

Zachary Margulis-Ohnuma

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CC: All Counsel
Gen. Hugo Carvajal (via U.S. Mail)